## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE:		:	CHAPTER 11
JOANN Inc.,		: :	CASE NO. 25-10068 (CTG)
	Debtor	: : :	

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND PAPERS

**PLEASE TAKE NOTICE** that Daniel M. Pereira, Esquire, of Stradley Ronon Stevens & Young, LLP, hereby enters his appearance in the above-captioned case on behalf of Rithum Corporation, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 1109(b), and hereby demands that all notices given or required to be given and all papers served or required to be served in this Chapter 11 case be delivered and served upon Rithum Corporation at the address set forth below:

Daniel M. Pereira, Esquire Stradley, Ronon, Stevens & Young, LLP 2005 Market Street, Suite 2600 Philadelphia, PA 19103 Telephone: (215) 564-8747

Facsimile: (215) 564-8120 E-mail: dpereira@stradley.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all notices, papers and pleadings referred to in the above-mentioned Federal Rules of Bankruptcy Procedure together with all orders and notices of applications, motions, petitions, pleadings, complaints or other documents which, in any way, affect the above-captioned debtor or its property.

PLEASE TAKE FURTHER NOTICE that Rithum Corporation does not intend for this request for notice or any later pleading, claim or suit to constitute a waiver of (1) the right of Rithum Corporation to have final orders in non-core matters entered only after <u>de novo</u> review by the District Court, (2) the right of Rithum Corporation to a trial by jury in any proceeding so triable in this case or in any case, controversy or proceeding related to this case, (3) the right of Rithum Corporation to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other right, claim, action, defense, set off or recoupment to which Rithum Corporation is or may be entitled.

STRADLEY, RONON, STEVENS & YOUNG, LLP

By: /s/ Daniel M. Pereira

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February 24, 2025

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## **CERTIFICATE OF SERVICE**

I, Daniel M. Pereira, do hereby certify that a true and correct copy of the foregoing request for notices was filed via the Court's CM/ECF system on February 24, 2025, and served on all counsel of record via electronic notification.

February 24, 2025

/s/ Daniel M. Pereira
Daniel M. Pereira, Esq.